Permit No. V-2046
Issued: 08/18/1999
Expiration Date: 08/18/2004

AIR POLLUTION CONTROL DISTRICT

150 S. Ninth Street
El Centro, CA 92243
(760) 339 4606

TITLE V OPERATING PERMIT

Issued in Accordance with the Provisions of 40 CFR Part 70
and Rule 900 of the Imperial County Air Pollution Control District

Company Name:	SFPP, L.P.
Facility Name:	SFPP, L.P.
SIC Code:	4226 (Special Warehouse and Storage)
Source Type:	Refined Petroleum Bulk Terminal and Loading Facility.
Plant Location:	345 W. Aten Road, Imperial, California.
Mailing Address:	1100 Town & Country Road, Orange, CA 92868.
Responsible Official:	W.M. White
Plant Site Contact:	Dan Milan
Telephone:	(760) 352 6370

Issued by:

Stephen L. Birdsall
Air Pollution Control Officer

Date

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Equipment Listing

I. Petroleum Product Storage Tanks

The following is listed for all storage tanks:

Tank I.D. Number, Maker, Diameter, Tank Design, Height, Capacity, Type of Roof, Type of Seal, Type of Primary Seal, and Type of Secondary Seal.

1. Storage Tank IP-2, Consolidated Western Steel, External Floating Roof, 80 ft Dia., 48 ft Height, 1,806,000 Gallons Capacity, Welded Shell, Pontoon Roof, Metallic Shoe Primary Seal, and Rim Mounted Wiper Secondary Seal.

2. Storage Tank IP-4, Consolidated Western Steel, External Floating Roof, 48 ft Dia., 48 ft Height, 630,000 Gallons Capacity, Welded Shell, Pontoon Roof, Metallic Shoe Primary Seal, and Rim Mounted Wiper Secondary Seal.

3. Storage Tank IP-5, Consolidated Western Steel, External Floating Roof, 47.5 ft Dia., 48 ft Height, 646,884 Gallons Capacity, Welded Shell, Pontoon Roof, Vapor Mounted Resilient Primary Seal, and Rim Mounted Wiper Secondary Seal.

4. Storage Tank IP-6, Graver Tank, External Floating Roof, 42.5 ft Dia., 40 ft Height, 420,000 Gallons Capacity, Welded Shell, Pontoon Roof, Metallic Shoe Primary Seal, and Rim Mounted Wiper Secondary Seal.

5. Storage Tank IP-8, Graver Tank, External Floating Roof, 61 ft Dia., 48 ft Height, Capacity 1,050,000 Gallons Capacity, Welded Shell, Pontoon Roof, Vapor Mounted Resilient Primary Seal, and Rim Mounted Wiper Secondary Seal.

6. Storage Tank IP-9, Chicago Bridge & Iron, External Floating Roof, 42.5 ft Dia., 40 ft Height, 420,000 Gallons Capacity, Welded Shell, Pontoon Roof, Vapor Mounted Resilient Primary Seal, and Rim Mounted Wiper Secondary Seal.

7. Storage Tank IP-10, Chicago Bridge & Iron, External Floating Roof, 42.5 ft Dia., 40 ft Height, 420,000 Gallons Capacity, Welded Shell, Pontoon Roof, Vapor Mounted Resilient Primary Seal, and Rim Mounted Wiper Secondary Seal.

8. Storage Tank IP-12, Pittsburgh-Des Moines, External Floating Roof, 42.5 ft Dia., 40

ft Height, 424,830 Gallons Capacity, Welded Shell, Pontoon Roof, Vapor Mounted Resilient Primary Seal, and Rim Mounted Wiper Secondary Seal.

9. Storage Tank IP-13, Chicago Bridge & Iron, Internal Floating Roof, 41.25 ft Dia., 49 ft Height, 462,000 Gallons Capacity, Welded Shell, Pan Roof, and Vapor Mounted Resilient Primary Seal.

10. Storage Tank IP-14, Chicago Bridge & Iron, Internal Floating Roof, 48.2 ft Dia., 49 ft Height, 630,000 Gallons Capacity, Welded Shell, Pan Roof, and Vapor Mounted Resilient Primary Seal.

11. Storage Tank IP-16, General American Transmission, Internal Floating Roof, 48 ft Dia., 48 ft Height, 646,800 Gallons Capacity, Welded Shell, Pan Roof, and Vapor Mounted Resilient Primary Seal.

12. Storage Tank IP-19, General American Transmission, Internal Floating Roof, 21.25 ft Dia., 24.2 ft Height, 63,000 Gallons Capacity, Welded Shell, Pan Roof, and Wiper Primary Seal.

13. Storage Tank IP-20, Consolidated Western Steel, External Floating Roof, 21.25 ft Dia., 24 ft Height, 63,000 Gallons Capacity, Welded Shell, Pontoon Roof, Metallic Shoe Primary Seal, and Rim Mounted Wiper Secondary Seal.

14. Storage Tank IPA-2 (Gasoline Additive), Aboveground-Fixed Roof, 27.8 ft Length, 7.96 ft Dia., 10,300 Gallons Capacity, Pressure Relief Valve {Owned by Shell Oil Company}.

15. Storage Tank IPA-3 (Red Dye-Tote System). Aboveground Tank, 360 Gallons Capacity.

16. Storage Tank IPA-7 (Gasoline Additive), Aboveground-Fixed Roof, 27.8 ft Length, 7.96 ft Dia., 8 ,000 Gallons Capacity, Pressure Relief.

17. Storage Tank IP-23, GATX, Internal Floating Roof, 55 ft Dia., 48 ft Height, 840,000 Gallons Capacity, Welded Shell, Pan Roof, Mechanical Shoe Liquid Mounted Primary Seal and Steel Compression Plate Secondary Seal.

18. Storage Tank IP-24, CB & I, Internal Floating Roof, 44 ft Dia., 40 ft Height, 420,000 Gallons Capacity, Welded Shell, Pan Roof, Mechanical Shoe Liquid Mounted Primary Seal and Wiper Type Secondary Seal.

19. Storage Tank IP-25, GATX, Internal Floating Roof, 55 ft Dia., 48 ft Height, 840,000 Gallons Capacity, Welded Shell, Pan Roof, Mechanical Shoe Liquid Mounted Primary Seal and Steel Compression Plate Secondary Seal.

20. Storage Tank IP-26, CB & I, Internal Floating Roof, 72 ft Dia., 40 ft Height, 1,113,000 Gallons Capacity, Welded Shell, Pan Roof, Mechanical Shoe Liquid Mounted Primary Seal and Steel Compression Plate Secondary Seal.

21. Storage Tank IP-A11, Internal Floating Roof, 11.8 ft Dia., 35.3 ft Height, 29,022 Gallons Capacity, Welded Shell, Liquid Mounted Resilient Primary Seal.

22. Storage Tank IP-A12, Internal Floating Roof, 10.8 ft Dia., 28.6 ft Height, 19,000 Gallons Capacity, Welded Shell, Liquid Mounted Resilient Primary Seal.

II. Vapor Processing Systems

1. NAO Enclosed Flame Vapor Burner, Model NVCU 72 C34, 800 CFM.

2. Tank IP-7, Vapor Holding Tank, Aboveground Storage Tank, Graver Tank Steel, Fixed Roof, 42.5 ft Dia., 40 ft Height, Welded Shell, Cone Roof with Bladder.

3. Saturator Tank, Horizontal Cylindrical Skid Mounted Tank, 10 ft Height, 20 ft Long.

4. Zeeco Vapor Burner, Model TFC4500,

III. Emergency Fire Pump

1. Clarke Fire Pump driven by a Detroit Diesel Engine, Model DDFPL3DT, 160 BHP at 3000 RPM.

IV. Vapor Extraction-Soil Remediation System

1. Ford 460 C.I.D. Engine, Model V3, 231 BHP @ 4200 RPM, Propane Auxiliary Fuel.

Permit Conditions

I. General Permit Conditions

1. The permittee shall obtain an Authority to Construct permit prior to the modification or replacement of any equipment for which a Permit to Operate has been granted; and prior to the installation and operation of any equipment for which an Authority to Construct is required. **ICAPCD Rule 201(B), Permits Required, adopted prior to 10/15/79.**

2. No Air contaminant shall be released into the atmosphere which causes a public nuisance. **ICAPCD Rule 117, Nuisances, adopted prior to 02/21/72.**

3. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82. **40 CFR Part 82, Protection of Stratospheric Ozone.**

4. Compliance with Permit Conditions

a. The permittee shall comply with all permit conditions;

b. This permit does not convey property rights or exclusive privilege of any sort;

c. Non-compliance with any permit conditions is ground for permit termination, revocation and reissuance, modification, enforcement action, or denial of permit renewal;

d. The permittee shall not use the "need to hold or reduce a permitted activity in order to maintain compliance" as a defense for noncompliance with any permit conditions;

e. A pending permit action or notification of anticipated noncompliance does not stay any permit conditions;

f. Within a reasonable time period, the permittee shall furnish any information requested by the air pollution control officer (APCO) of ICAPCD, in writing, for the purpose of determining: 1)compliance with the permit, 2) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action. **ICAPCD Rule 900.F.2.k, Procedures for Issuing Permit to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, Adopted 12/14/93; ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Emission Specification Condition 1; ATC Permit 2771, Condition 1; ATC Permit 1767B, Conditions 1, 2, 3 and 4; ATC Permit 1767B, Conditions 1, 2, 3 and 4; ATC Permit 1766B, Conditions 1, 2, 3 and 4; ATC Permit 2145B, Conditions 1, 2, 3 and 4; ATC Permit 1769A, Conditions 1; ATC Permit 2540, Conditions 1.**

II. Emission Limits

A. Petroleum Product Storage Tanks

1. An external floating roof shall not be used if the organic liquid stored has a true vapor pressure of 11 psi absolute or greater under storage conditions. **ICAPCD Rule 414(a)(1)(H), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79.**

2. A fixed roof container with an internal-floating-type cover shall not be used if the organic liquid stored has a true vapor pressure of 11 psi absolute or greater under storage conditions. **ICAPCD Rule 414(a)(2)(A), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79.**

3. The permittee shall not place, store or hold in any stationary tank, reservoir or other container of more than 39,630 gallon capacity, any organic liquid having a true vapor pressure of 1.5 psi absolute or greater under actual storage conditions, unless it is designed and equipped with one of the following vapor loss control devices: (a) an external floating roof or (b) a fix roof with an internal-floating-type cover. **ICAPCD Rule 414(a), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79; 40 CFR 60.112(a)(1){IP-23 and IP-25}; 40 CFR 60.112a(2){IP-24}; 40 CFR 60.112b(a)(1){IP-26}.**

B. Loading Racks/Vapor Collection and Vapor Processing Systems.

1. The permittee shall not load gasoline into any tank and tank truck or trailer from any

loading facility unless such loading facility is equipped with a vapor combustion system. **ICAPCD Rule 415.1, Gasoline Loading into Tank Trucks and Trailers, adopted prior to 10/15/79.**

2. The facility shall be equipped with a vapor collection system designed to collect the total organic compounds vapors displaced from tank trucks during product loading. **40 CFR, Part 60.502(a).**

3. The emissions to the atmosphere from the vapor collection system due to the loading of liquid products into gasoline tank trucks are not to exceed 35 milligrams of total organic compounds per liter (0.29 lb/1000 gallons) of gasoline loaded. **40 CFR, Part 60.502(b).**

4. The permittee shall not release or discharge air contaminants into the atmosphere from any single processing unit source or other contrivance, in excess of 0.2 grains per cubic foot of gas at standard conditions. **ICAPCD Rule 403.A, Quantity of emissions, adopted 11/19/85.**

5. The permittee shall not release into the atmosphere from any single source of emission, sulfur compounds, calculated as sulphur dioxide (SO_2) in excess of 0.2 percent by volume, measured at the point of discharge. **ICAPCD Rule 405, Sulfur Compounds, adopted prior to 11/04/77.**

7. The NAO Vapor Processing Unit shall comply with the following emission limitations:

a. The destruction efficiency of hydrocarbon compounds for the vapor processing system shall be at least 90 percent. **ICAPCD Rule 415.1(C), Gasoline Loading into Tank Trucks and Trailers, adopted prior to 10/15/79.**

b. Opacity of Emissions from the vapor combustor's stack shall not exceed 10% for a period or periods aggregating more than three (3) minutes in any hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Emission Specification Condition 3.**

c. The concentration of Nitrogen Oxides (NOx) in the stack exhaust shall not exceed 53 ppmv. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Emission Specification Condition 3.**

8. The Zeeco Vapor Processing Unit shall comply with the following emission limitations

a. The thermal oxidizer unit shall control a minimum of 95% gasoline vapor volume going into the thermal oxidizer. **ICAPCD Rule 415.1(C), Gasoline Loading into Tank Trucks and Trailers, adopted prior to 10/15/79 and ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 538B, Emission Specifications, Condition A.1.**

b. The stack visible opacity shall not exceed 10% for more than 3 minutes in any one hour. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 538B, Emission Specifications, Condition A.3.**

C. Emergency Fire Pump

1. The fire pump's engine shall not discharge into the atmosphere any visible air contaminants other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour, which is 20% opacity or greater. **ICAPCD Rule 401.A.1, Opacity of Emissions, adopted 11/19/85; ATC Permit 2737, Condition 4.**

D. Tanks IPA-2, IPA5, IP-A11 and IP-12.

1. These tanks must not be used for storing petroleum liquid having a true vapor pressure of 569 mmHg (11 psi) absolute or greater under storage conditions. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2729, Condition 2; Permit to Operate 1769A, Condition 2; Permit to Operate 2540, Condition 2.**

2. The permittee shall reimburse the ICAPCD for the cost of any additional inspections performed by the ICAPCD and inspectors under contract. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2729, Condition 3; Permit to Operate 1769A, Condition 4; Permit to Operate 2540, Condition 2 {District Only}.**

III. Operational Limits

A. Petroleum Product Storage Tanks

1. The external floating roof tanks: IP-2, IP-4, IP-5, IP-6, IP-8, IP-9, IP-10, IP-12, and IP-20 shall have both a primary and secondary seal, one above the other. The floating roof shall consist of a pontoon-type or double-deck-type cover and shall rest on the surface of the liquid contents. The primary and secondary seals shall comply with the following requirements:

a. For a closure device on a welded tank shell which uses a metallic-shoe-type seal as its primary seal:

i. Gaps between the tank shell and the primary seal shall not exceed 1 - ½ inches for an accumulative length of 10 percent, ½ inch for another 30 percent, and inch for the remaining 60 percent of the circumference of the tank. No gap between the tank shell and the primary seal shall exceed 1 - ½ inches. No continuous gap greater than inch shall exceed 10 percent of the circumference of the tank.

ii. Gaps between the tank shell and the secondary seal shall not exceed inch for an accumulative length of 95 percent of the circumference of the tank, and shall not exceed ½ inch for an accumulative length of the remaining 5 percent of the circumference of the tank. No gap between the tank shell and the secondary seal shall exceed ½ inch.

iii. Metallic-shoe-type seals installed on or after February 1, 1980, shall be installed so that one end of the shoe extends into the stored liquid and the other end extends a minimum vertical distance of 24 inches above the stored liquid surface.

iv. The geometry of the shoe shall be such that the maximum gap between the shoe and the tank shell is no greater than double the gap allowed by the seal gap criteria for a length of at least 18 inches in the vertical plane above the liquid surface. There shall be no holes or tears in, or openings which allow the emissions of organic vapors through the secondary seal or in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, stored liquid surface, shoe, and seal fabric.

v. The secondary seal shall allow easy insertion of probes up to 1 - ½ inches width in order to measure gaps in the primary seal.

vi. The secondary seal shall extend from the roof to the tank shell and shall not be attached to the primary seal.

b. For a closure device which uses a resilient-toroid-type seal as its primary seal:

i. Gaps between the tank shell and the primary seal shall not exceed inch for an accumulative length of 95 percent of the circumference of the tank, and shall not exceed ½ inch for an accumulative length of the remaining 5 percent of the tank circumference. No gap between the tank shell and the primary seal shall exceed ½ inch.

ii. Gaps between the tank shell and the secondary seal shall not exceed inch for an accumulative length of 95 percent of the circumference of the tank, and shall not exceed ½ inch for an accumulative length of the remaining 5 percent of the tank circumference. No gap between the tank shell and the secondary seal shall exceed ½ inch.

iii. There shall be no holes or tears in, or openings which allow the emissions of organic vapor through the secondary seal or in the primary seal envelope surrounding the annular vapor space enclosed by the roof edge, seal fabric and secondary seal.

vi. The secondary seal shall allow easy insertion of probes up to ½ inch in width in order to measure gaps in the primary seal.

v. The secondary seal shall extend from the roof of the tank to the shell and not be attached to the primary seal.

c. All openings in the roof except pressure-vacuum valves, which shall be set to within ten percent of the maximum allowable working pressure of the roof, shall provide a projection below the liquid surface to prevent belching of liquid and to prevent entrained or formed organic vapor from escaping from the liquid contents of the tank and shall be equipped with a cover, seal, or lid. The cover, seal, or lid shall at all times be in a closed position, with no visible gaps, except when the device or appurtenance is in use. Automatic-bleeder vents are to be closed at all times except when the roof is floated off or landed on the roof leg supports. The rim vents, if provided, are to be set to open when the roof is being floated off the roof leg supports, or at the manufacturers recommended settings.

d. Any emergency roof drain shall be provided with a slot membrane fabric cover, or equivalent, that covers at least nine-tenths of the area of the opening. **ICAPCD Rule 414(a)(1)(A), (B), (F) and (G), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79.**

2. The fix roof tanks with an internal-floating-roof: IP-13, IP-14, IP-16, IP-19, IP-23, IP-24, IP-25, IP-26, IP-A11, and IP-A12 shall be equipped with a closure device between the wall of the storage tank and the edge of the internal floating roof. **ICAPCD Rule 414(a)(2), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79; and Permit to Operate 1769A, Condition 2; 40 CFR 60.112a(a)(2){IP-24}; 40 CFR 60.112b(a)(1)(ii)(A){IP-26}.**

3. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possibly. **40 CFR 60.112a(a)(2){IP-24}; 40 CFR 60.112b(a)(1)(i){IP-26}**

4. All vapor control devices shall be properly installed, properly maintained and in good operating order all the time. **ICAPCD Rule 414(a), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79.**

5. All openings in the roof except pressure-vacuum valves, which shall be set to within ten percent of the maximum allowable working pressure of the roof and shall provide a projection below the liquid surface. **40 CFR 60.112a(a)(2){IP-24}; 40 CFR 60.112b(a)(1)(iii){IP-26}.**

6. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains are to be equipped with a cover or lid which is to be maintained in a closed position at all times except when the device is in actual use. The cover or lid shall be equipped with a gasket. Cover on each access hatch and automatic gauge float well shall be bolted except when they are in use. **40 CFR 60.112a(a)(2){IP-24}; 40 CFR 60.112b(a)(1)(iv){IP-26}.**

7. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. **40 CFR 60.112a(a)(2){IP-24}; 40 CFR 60.112b(a)(1)(v){IP-26}.**

8. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended settings.**40 CFR 60.112a(a)(2){IP-24}**; **40 CFR 60.112b(a)(1)(vi){IP-26}.**

9. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers al least 90 percent of the opening. **40 CFR 60.112b(a)(1)(vii){IP-26}.**

10. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. **40 CFR 60.112b(a)(1)(ix){IP-26}.**

11. Each penetration of the internal floating roof that allows the passage of a ladder shall have a gasketed sliding cover. **40 CFR 60.112b(a)(1)(x){IP-26}.**

B. Loading Racks/Vapor Collection and Vapor Processing Systems.

1. The vapor combustion system shall be properly installed, in good working order and in operation during gasoline loading. **ICAPCD Rule 415.1, Gasoline Loading into Tank Trucks and Trailers, adopted prior to 10/15/79.**

2. All loading and vapor lines shall be equipped with fittings which make vapor-tight connections and which close automatically when disconnected. **ICAPCD Rule 415.1, Gasoline Loading into Tank Trucks and Trailers, adopted prior to 10/15/79.**

3. The vapor collection system shall be designed to prevent any total organic compounds vapors collected at one loading rack from passing to another loading rack. **40 CFR, Part 60.502(d).**

4. Loading of liquid products into gasoline tank trucks shall be limited to vapor-tight gasoline tank trucks using the following procedures:

a. The permittee shall obtain the vapor tightness documentation described in V.4 for each gasoline tank truck which is to be loaded at the facility.

b. The permittee shall require the tank identification number to be recorded as each gasoline tank truck is loaded at the facility.

c. The permittee shall cross-check each tank identification number obtained in section III.B.4.b with the file of tank vapor tightness documentation within 2 weeks after the corresponding tank is loaded.

d. The permittee shall notify the owner or operator of each nonvapor-tight gasoline tank truck loaded at the facility within 3 weeks after the loading has occurred.

e. The permittee shall take steps assuring that the nonvapor-tight gasoline tank truck will not be reloaded at the facility until vapor tightness documentation for that tank is obtained.

f. Alternate procedures to those described in section III.B.4.a through III.B.4.e for limiting gasoline tank truck loadings may be used upon application to, and approval by, the administrator. **40 CFR, Part 60.502(e).**

5. The permittee shall act to assure that loadings of gasoline tank trucks at the facility are made only into tanks equipped with vapor collection equipment that is compatible with the terminal's vapor collection system. **40 CFR, Part 60.502(f).**

6. The permittee shall act to assure that the terminal's and the tank truck's vapor collection systems are connected during each loading of a gasoline tank truck at the facility. Examples of actions to accomplish this include training drivers in the hookup procedures and posting visible reminder signs at the affected loading racks. **40 CFR, Part 60.502(g).**

7. The vapor collection and liquid loading equipment shall be designed and operated to prevent gauge pressure in the delivery tank from exceeding 4,500 pascals (450 mm of water) during product loading. This level is not to be exceeded when measured by the procedures specified in IV.B.4. **40 CFR, Part 60.502(h).**

8. No pressure-vacuum in the vent in the bulk gasoline terminal's vapor collection system shall begin to open at a system pressure less than 4,500 pascals (450 mm of water). **40 CFR, Part 60.502(i).**

9. The Zeeco Vapor Processing Unit shall comply with the following operational limits:

a. The thermal oxidizer shall have a continuous temperature monitor. The monitor shall be accessible and visible to any inspector. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 538B, Emissions Specifications, Condition A.2.**

b. The thermal oxidizer shall be maintained in good working order at all times. In the event of any equipment breakdown or malfunction, including detectable gasoline

vapor leaks fro loading hoses, the permittee shall cease gasoline loading operations immediately and repair the breakdown before commencing gasoline loading. The permittee shall notify the District of all breakdown and their current operating status within two hours after the breakdown. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; Permit to Operate 538B, Control Equipment Specifications.**

C. Emergency Fire Pump

1. The diesel-fueled fire pump shall be restricted to operate a total of 100 hours per year for maintenance purposes. **ICAPCD Rule 207, New Source Review, revised 09/07/93; ATC Permit 2737, Condition 1. {District Only}**

2. Operation for other than maintenance purposes shall be limited to providing backup power, and shall in each instance be documented to satisfaction of the ICAPCD. **ICAPCD Rule 207, New Source Review, revised 09/07/93; ATC Permit 2737, Condition 2. {District Only}**

3. The permittee shall install an operating hour meter on the engine. **ICAPCD Rule 207, New Source Review, revised 09/07/93; ATC Permit 2737, Condition 5. {District Only}**

IV. Monitoring, Testing, and Analysis

A. Petroleum Product Storage Tanks

1. The primary seal envelope on the external floating roof tanks: IP-2, IP-4, IP-5, IP-6, IP-8, IP-9, IP-10, IP-12, and IP-20 shall be made available for unobstructed inspection by the Air Pollution Control Officer on an annual basis at locations selected along its circumference at random by the Air Pollution Control Officer. If the Air Pollution Control Officer detects one or more violations as a result of any such inspection, the Air Pollution Control Officer may require such further unobstructed inspection of the primary seal as may be necessary to determine the seal condition for its entire circumference. **ICAPCD Rule 414(a)(1)E), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79.**

2. For the external floating roof tanks: IP-2, IP-4, IP-5, IP-6, IP-8, IP-9, IP-10, IP-12, and IP-20 with secondary seals, the primary seal envelope shall be made available

for unobstructed inspection by the Air Pollution Control Officer for the full circumference at the following times: i) prior to installation of the secondary seal, ii) thereafter every 5 years, iii) if the secondary seal is voluntarily removed by the owner or operator, it shall be made available for such inspection at that time. The owner or operator shall provide notification to the Air Pollution Control Officer no less than 7 working days prior to voluntary removal of the secondary seal. **ICAPCD Rule 414(a)(1)(E), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79.**

3. The permittee shall visually inspect the internal-floating-roof and the primary seal on tanks: IP-13, IP-14, IP-16, IP-19, IP-23, IP-24, IP-25, IP-26, IP-A11, and IP-A12 through manholes and roof hatches on the fixed roof at least once every 12 months after initial filling. The permittee shall make any repairs or empty and remove the tank from service within 45 days of problem detection. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93; 40 CFR Part 60.113b(a)(2){IP26}.**

4. The permittee shall visually inspect the internal-floating-roof, the primary seal, gaskets, slotted membranes and sleeve seals (if any) on tanks: IP-13, IP-14, IP-16, IP-19, IP-23, IP-24, IP-25, IP-26, IP-A11, and IP-A12 every time the tanks are emptied and degassed. The permittee shall repair the items, if necessary, before refilling the storage tank. Inspections shall not occur at intervals greater than 10 years. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93; 40 CFR Part 60.113b(a)(4){IP-26}.**

B. Loading Racks/Vapor Processing System

1. The permittee shall conduct an annual performance test at the vapor combustor's stack on the NAO thermal oxidizer unit. USEPA Method 21 shall be used to monitor for leakage of vapor at all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. All readings of 10,000 ppm (as methane) or greater shall be repaired before conducting the test. The performance test shall include, but not be limited to, the determination of the following parameters: hydrocarbon destruction efficiency (percentage and lb/1000 gal); nitrogen oxides, ppm; and sulfur dioxide, ppm. **ICAPCD Rule 207, New Source Review, adopted prior to 3/17/80, ATC Permit 2046A, Monitoring; 40 CFR, Part 60.503(b); and ICAPCD Rule 900.F.2.e, Procedures for Issuing**

Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.

2. The performance test shall be conducted under the following parameters:

a. The performance test shall be 6 hours long during which at least 80,000 gallons (300,000 liters) of gasoline is loaded.

b. The performance test shall be conducted in intervals of 5 minutes. For each interval "I", readings from each measurement shall be recorded, and the volume exhausted and the corresponding average total organic compound's concentration shall be determined. The sampling system response time shall be considered in determining the average total organic compounds concentration corresponding to the volume exhausted.

c. Method 2B shall be used to determine the volume air-vapor mixture exhausted at each interval.

d. Methods 25A and 25B shall be used for determining the total organic compounds concentration at each interval. The calibration gas shall be either propane or butane.

e. To determine the volume of gasoline dispensed during the performance test period at all loading racks whose vapor emissions are controlled by the processing system being tested, terminal records or reading from gasoline dispensing meters at each loading rack shall be used. **40 CFR, Part 60.503(c).**

f. Nitrogen oxides shall be measured in accordance with U.S. EPA Method 7e. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Monitoring**.

g. Sulfur dioxide shall be measured in accordance with U.S. EPA Method 6. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

h. The performance test shall be witnessed by APCD personnel. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Monitoring; 40 CFR, Part 60.503(c).**

3. Each calendar month, the vapor collection system, the vapor processing system, and each loading rack handling gasoline shall be inspected during the loading of gasoline tank trucks for total organic compounds liquid or vapor leaks. Detection methods incorporating sight, sound, or smell are acceptable. Each detection of a leak shall be recorded and the source of the leak repaired within 15 calendar days after it is detected. **40 CFR, Part 60.502(j).**

4. The permittee shall determine compliance with the standard in section III.B.7 as follows:

a. A pressure measurement device (liquid manometer, magnehelic gauge, or equivalent instrument), capable of measuring up to 500 mm of water gauge pressure with +/-2.5 mm of water precision, shall be calibrated and installed on the terminal's vapor collection system at a pressure tap located as close as possible to the connection with the gasoline tank truck.

b. During the performance test, the pressure shall be recorded every 5 minutes while a gasoline truck is being loaded; the highest instantaneous pressure that occurs during each loading shall also be recorded. Every loading position must be tested at least once during the performance test. **40 CFR, Part 60.503(d).**

5. The permittee shall conduct an annual performance test at the vapor combustor's stack on the Zeeco thermal oxidizer unit. The performance test shall be conducted according to IV.B.2. The performance test shall include, but not be limited to, the determination of the following parameters: hydrocarbon destruction efficiency (percentage and lb/1000 gal). USEPA Method 21 shall be used to monitor for leakage of vapor at all potential sources in the terminal's vapor collection system equipment while a gasoline tank truck is being loaded. All readings of 10,000 ppm (as methane) or greater shall be repaired before conducting the test. **ICAPCD Rule 207, New Source Review, adopted prior to 3/17/80; Permit to Operate 538B, Monitoring, Condition B.1, 40 CFR, Part 60.503(b), and ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93**.

6. The APCD shall witness all performance tests. **ICAPCD Rule 207, New Source Review, adopted prior to 3/17/80; Permit to Operate 538B, Monitoring, Condition B.2.**

7. The permittee shall determine compliance with the opacity limits for the NAO and

Zeeco thermal oxidizers using U.S. EPA Method 22. Daily inspections shall be conducted while the equipment is operating and during daylight hours. If any visible emissions, excluding condensed water vapor, are detected during an inspection and the emissions are observed continuously or intermittently for 3 minutes in any hour, the permittee shall:

a. Take corrective actions that eliminate the visible emissions and report the visible emission as a potential exceedance.

b. If all visible emissions are not eliminated through corrective actions within 24 hours, the permittee shall have a CARB-certified smoke-reader determine compliance with the opacity standard, using EPA Method 9. Inspection shall be conducted for 6 minutes within 3 days of problem detection. The certified smoke-reader shall continue to used Method 9 on a daily basis until the daily readings show compliance with the applicable limit. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

C. Emergency Fire Pump

1. A log shall be maintained on the premises showing hours of operation and routine repairs of the generator engine. This log shall be made available for inspection to the ICAPCD. **ICAPCD Rule 207, New Source Review, revised 09/07/93; ATC Permit 2737, Condition 3. {District Only}**

V. Recordkeeping Requirements

1. The permittee shall keep accurate records of liquids stored in any stationary tank, reservoir or other container covered by this permit and the true vapor pressure ranges of such liquids. The true vapor pressure in psi absolute of stored liquid may be determined by using the nomographs contained in American Petroleum Institute Bulletin 2527 for conversion of Reid vapor pressure to true vapor pressure. **ICAPCD Rule 414(a)(5), Storage of Organic Liquids at Terminals and Large Bulk Loading Facilities, adopted 12/11/79; 40 CFR Part 60.113(a) and (b){IP-23 and IP-25}; 40 CFR Part 60.115a(a) and (b){IP-24}; 40 CFR Part 60.116b(c) and (e)(2){IP-26}.**

3. The tank truck vapor tightness documentation required under III.B.4(a) shall be kept on file at the terminal in a permanent form available for inspection. **40 CFR, Part**

60.505(a).

4. The documentation file for each gasoline tank truck shall be updated at least once per year to reflect current test results as determined by Method 27. This documentation shall include, as a minimum, the following information:

a. Test title: Gasoline Delivery Tank Pressure Test-EPA Reference Method 27.

b. Tank owner and address.

c. Tank identification number.

d. Testing location.

e. Date of test.

f. Tester name and signature.

g. Witnessing inspector, if any: Name, signature, and affiliation.

h. Test results: Actual pressure change in 5 minutes, mm of water (average for 2 runs). **40 CFR, Part 60.505(b).**

5. A record of each monthly leak inspection required under IV.B.3 shall be kept in file at the terminal for at least 5 years. Inspection records shall include, as a minimum, the following:

a. Date of inspection.

b. Findings (may indicate no leaks discovered; or location, nature, and severity of each leak).

c. Leak determination method.

d. Corrective action (date each leak repaired; reasons for any repair interval in excess of 15 days).

e. Inspector name and signature. **40 CFR, Part 60.505(c), and ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to**

Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.

6. The permittee shall keep documentation of all notifications required under III.B.4(d) on file at the terminal for at least 5 years. **40 CFR, Part 60.505(d), and ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

7. The permittee shall keep records of all replacements or additions of all replacements or additions of components performed on an existing vapor processing system for at least 5 years. **40 CFR, Part 60.505(f), and ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

8. Records of all monitoring and support information shall include the following: 1) date, place, and time of measurement or maintenance activity; 2) operating conditions at the time of measurement or maintenance activity; 3) date, place, name or company or entity that performed the measurement or maintenance activity and the methods used; and 4) results of the measurement or maintenance. **ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

9. The permittee shall maintain records of all visible emission observations conducted. The Smoke Emission Inspection form for outdoor location from EPA Method 22 shall be used to record all inspections. Additionally, the following records shall be required:

a. For each emission point where corrective action is required: i) nature of visible emissions, ii) description of corrective actions taken to abate visible emissions, and iii) date and time visible emission was abated.

b. When EPA Method 9 is required: i) all visible emission observations conducted by a certified smoke reader, and ii) name of the person conducting the inspection and measurement, or monitoring. **ICAPCD Rule 900.F.2.e, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

10. Records of all required monitoring data and support information shall be retained for at least five years from date of initial entry. **ICAPCD Rule 900.F.2.f, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal**

CAA Amendments of 1990, adopted 12/14/93.

11. The permittee shall keep a record of the applicability determination in order to maintain exemption with 40CFR, Part 63, Subpart R. The operator shall keep a record of the applicability determination on the site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source. The record of applicability determination shall include an analysis that demonstrates why the operator believes the source is unaffected. The analysis shall be sufficiently detailed to allow the Administrator to make a finding about the source's applicability status with regard to the relevant standard or other requirement. **40 CFR, Part 63.10(b)(3).**

VI. Reporting Requirements

1. The permittee shall submit a report with the results of the performance test conducted according to the requirements of IV.B.1. The report shall be submitted to the APCD no later than 60 days after the performance test is conducted. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Monitoring**.

2. The permittee shall submit a report with the results of the performance test conducted according to the requirements of IV.B.5. The report shall be submitted to the APCD no later than 60 days after the performance test is conducted. **ICAPCD Rule 900.F.2.g, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

3. The permittee shall submit to the APCD the total yearly volume terminal throughput of gasoline and diesel by the end of February of each operating year. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2046A, Reporting and Permit to Operate 538B, Reports, Condition F.**

4. The permittee shall report any deviation from requirements in this Permit to Operate, other than deviations reported to the District pursuant to the District Upset/ Breakdown rule, to the APCO within 2 days of occurrence. The permittee shall use District approved forms to report any deviations. **ICAPCD Rule 900.F.2.g, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

5. The permittee shall submit a written report to the APCO within ten days after a

breakdown occurrence has been corrected. This report shall include: a) a statement that the occurrence has been corrected, together with the date of correction and proof of compliance; b) the reason(s) or cause(s) of the occurrence; c) a description of the corrective measures undertaken; and d) the type of emission and estimated quantity of the emissions caused by the occurrence. **ICAPCD Rule 111(D), Equipment Breakdown, adopted 12/11/79.**

6. The permittee shall submit a written monitoring report to the APCD every six months. The report shall identify any deviations from permit requirements, including those previously reported to the APCO. The report shall be submitted before the end of July and January of each operating year All reports of a deviation from permit requirements shall include the probable cause of the deviation and any preventive or corrective action taken. The permittee shall use District approved forms for the report regarding deviation from permit requirements and shall also include a written statement from the responsible official which certifies the truth, accuracy, and completeness of the report. When no deviations have occurred for the semester, such information shall be stated in the report. **ICAPCD Rule 900.F.2.g, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

7. The permittee shall submit an annual report for the emergency fire pump containing the monthly fuel consumption and hours of operation per year. The annual report shall be submitted to the ICAPCD by the end of February of each operating year. **ICAPCD Rule 207, New Source Review, revised 09/07/93; ATC Permit 2737, Condition 6. {District Only}**

8. The permittee shall submit to the ICAPCD an annual report containing the yearly volume throughput from tanks IPA-2, IPA-5, Red Dye Tote, IP-A11 and IP-A12. The annual report shall be submitted to this office by the end of February of each operating year. **ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 2729, Condition 4; Permit to Operate 1769A, Condition 5; and Permit to Operate 2540, Condition 5.**

VII. Emergency Provisions

1. The permittee shall notify the ICAPCD of any upset conditions, breakdown or schedule maintenance which cause a violation of emission limitations prescribed by District Rules and Regulations, or by State law. The District shall be notified as soon as reasonably possible but not later than two (2) hours after its detection.

The completion of corrective measures or the shut down of emitting equipment is required within 24 hours of occurrence of a breakdown condition. **ICAPCD Rule 111.C, Equipment Breakdown, adopted 12/11/79, ICAPCD Rule 207, New Source Review, adopted prior to 03/17/80; ATC Permit 538B, Condition 2.**

2. If the breakdown condition will either require more than 24-hours to correct or persist longer than the end of the production run (except for continuous monitoring equipment, for which the period shall be ninety-six (96) hours), the owner or operator may, in lieu of shutdown, request the Air Pollution Control Officer to commence the emergency variance procedure. **ICAPCD Rule 517, Emergency Variance, adopted 12//11/79 {State and District only}.**

3. Within two weeks of an emergency event, the operator shall submit to the District a properly signed, contemporaneous log or other relevant evidence which demonstrates that: a) an emergency occurred; b) Permittee can identify the cause(s) of the emergency; c) the facility was being properly operated at the time of the emergency; d) all steps were taken to minimize the emissions resulting from the emergency; and e) within two working days of the emergency event, the permittee provided the District with a description of the emergency and any mitigation or corrective actions taken. **ICAPCD Rule 900.F.2.l, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

4. In any enforcement proceeding, the permittee has the burden of proof for establishing that an emergency occurred. **ICAPCD Rule 900.F.2.l, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

VIII. Compliance

1. Compliance Certification

The permittee shall submit compliance certification reports to the U.S.EPA, Director, Air Division, 75 Hawthorne Street, AIR-3, San Francisco, CA 94105 and the APCO every 12 months. These reports shall be submitted by the end of February of each preceding operating year. The reports shall include the following requirements: a) identify the basis for each permit term or condition and a means of monitoring compliance with the term or condition; b) the compliance status and method(s) used to determine compliance for the current time period and over the entire reporting

period; and c) any additional inspection, monitoring, or entry requirement that may be promulgated pursuant to sections 114(a) and 504(b) of the CAA. The permittee shall use District approved forms for the compliance certification and shall also include a written statement form the responsible official which certifies the truth, accuracy, and completeness of the report. **ICAPCD Rule 900.F.2.n, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

IX. Right of Entry

1. The Regional Administrator of United States Environmental Protection Agency (U.S. EPA), the Executive Officer of the California Air Resources Board, the APCO, or their authorized representatives, upon the presentation of credentials, shall be permitted to enter upon the premises:

a. To inspect the stationary source, including equipment, work practices, operations, and emissions-related activity; and

b. To inspect and duplicate records required by this Permit to Operate; and

c. To sample substances or monitor emissions from the source or other parameters to assure compliance with the permit or applicable requirements. Monitoring of emissions can include source testing. **ICAPCD Rule 900.F.2.j, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

X. Severability

1. The provisions of this Permit to Operate are severable and if any provisions of this Permit to Operate are held invalid, the reminder of this Permit to Operate shall not be affected thereby. **ICAPCD Rule 900.F.2.m, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

XI. Permit Life

1. This Permit to Operate shall become invalid five years from the date of issuance unless a timely and complete renewal application is submitted to the district. The permittee shall apply for renewal of this permit no earlier than 18 months and no

later than 6 months before the expiration date of the current permit to operate. Upon submittal of a timely and complete renewal application, this permit to operate shall remain in effect until the APCO issues or deny the renewal application. **ICAPCD Rule 900.F.2.o, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

XII. Payment of Fees

1. The permittee shall remit the Title V annual fee to the District in a timely basis. Failure to remit fees on a timely basis shall result in forfeiture of this Permit to Operate. Operation without a permit to operate subjects the source to potential enforcement action by the District and the U.S. EPA pursuant to section 502(a) of the Clean Air Act. **ICAPCD Rule 900.F.2.p, Procedures for Issuing Permits to Operate for Sources Subject to Title V of the Federal CAA Amendments of 1990, adopted 12/14/93.**

XIII. Contracted Emissions/Soil Remediation System

1. A log shall be maintained on the premises showing hours of operation and routine repairs of the engine. This log shall be made available for inspection by the ICAPCD. **ICAPCD Rule 207, New Source Review, adopted 11/10/80; ATC Permit 2744, Condition 1.**

2. The engine shall not discharge into the atmosphere any visible air contaminants other than uncombined water vapor, for a period or periods aggregating more than three minutes in any one hour, which is 20% opacity or greater. **ICAPCD Rule 207, New Source Review, adopted 11/10/80; ATC Permit 2744, Condition 2.**

3. The permittee shall install an operating hour meter on the engine. **ICAPCD Rule 207, New Source Review, adopted 11/10/80; ATC Permit 2744, Condition 3.**

4. The permittee shall submit an annual report containing the results of the monthly total hydrocarbon testing as described in Condition 5. The annual report shall be submitted to the ICAPCD by the end of February of each operating year. **ICAPCD Rule 207, New Source Review, adopted 11/10/80; ATC Permit 2744, Condition 4.**

5. The permittee shall test the exhaust of equipment for total hydrocarbon emissions at start up, and monthly thereafter. **ICAPCD Rule 207, New Source Review,**

adopted 11/10/80; ATC Permit 2744, Condition 5.